

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

M.J.J.,

Plaintiff,

Civil Action No. 15-cv-433-wmc

v.

POLK COUNTY SHERIFF'S DEPARTMENT
and DARRYL L. CHRISTENSEN,

Defendants.

**PLAINTIFF'S AMENDED CONSENTED MOTION FOR LEAVE
TO FILE SECOND AMENDED COMPLAINT**

Plaintiff, M.J.J., by and through her undersigned counsel, hereby requests leave pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, to file a Second Amended Complaint. Defendants consent to the relief requested herein and have provided written consent, Exhibit A.

Plaintiff seeks leave to file a Second Amended Complaint that adds an additional Count that Defendant Polk County Sheriff's Department violated 42 U.S.C. §§ 1983 and 1986 when it failed to implement policies and train inmates on how to report sexual abuse, as is required by the Prison Rape Elimination Act. In addition, the Second Amended Complaint will clarify that the claims against Defendant Polk County Sheriff's Department are rooted under the 14th Amendment as well as the 8th Amendment.

Plaintiff's proposed Second Amended Complaint is attached hereto as Exhibit B.

ECKBERG LAMMERS, P.C.

Dated: June 27, 2016

By: /s/ Lida M. Bannink
Thomas J. Weidner (1082013)
Lida M. Bannink (1088518)
430 Second Street
Hudson, Wisconsin 54016
(715) 386-3733
tweidner@eckberglammers.com
lbannink@eckberglammers.com